



1114 Avenue of the Americas, 23rd Floor
New York, New York 10036.7703 USA
P. 212.880.6000 | F. 212.682.0200
www.torys.com

Bill Gray
wgray@torys.com
P. 212.880.6336

April 2, 2019

VIA E-MAIL

Honorable Sean H. Lane
United States Bankruptcy Judge
Southern District of New York
One Bowling Green
Courtroom 701
New York, NY 10004-1408

Re: In re: Jeffrey Lew Liddle
Case No. 19-10747 (shl)

Dear Judge Lane:

We are the proposed attorneys for the Debtor and Debtor-In-Possession, Jeffrey L. Liddle, in the above-referenced case. Yesterday, the Court entered the "Order Granting Debtor's Motion For An Order Under 11 U.S.C. §§105, 542, and 543 Directing Custodian To Turnover Property And For An Interim Order Authorizing The Debtor To Pay Rent Expenses And Granting Related Relief" (ECF No. 27) which provided, *inter alia*, that any further distributions from the Debtor's Debtor-In-Possession Account (the "DIP Account") be subject to further order of the Court.

As part of the continuing discussions on interim cash collateral issues, all parties claiming a cash collateral interest in the Escrowed Funds, which have now been deposited into the DIP Account, have consented to pay Rose Reverendo, the Debtor's legal assistant, her regular two week payroll amount, subject to the usual deductions and withholdings, for the period of April 1 through April 15. We respectfully request that the Court treat this letter as a request for an entry of an Order authorizing this payment.

As a further update, negotiations regarding the remainder of the interim cash collateral issues are ongoing. I have requested some additional time over the next several days to review with the Debtor the terms of the proposed cash collateral arrangements and the management of the DIP Account.

Very truly yours,

/s/ William F. Gray

William F. Gray, Jr.

SO ORDERED

Dated: April 2, 2019

/s/ Sean H. Lane

HONORABLE SEAN H. LANE
UNITED STATES BANKRUPTCY JUDGE

cc: Arnold E. Reiter (via e-mail)
Attorney for Tara Liddle

David H. Wander (via e-mail)
Davidoff Hutcher & Citron LLP
Attorney for Counsel Financial II, LLC

Randolph E. White (via e-mail)
White & Wolnerman, PLLC

Andrea Schwartz (via e-mail)
Office of the U.S. Trustee